

The City of Miami associates itself with the Comments of the national organizations of local government including the U.S. Conference of Mayors, NATOA, National League of Cities, NACo, and TeleCommUnity, and files these supplemental comments to highlight what we believe to be vitally important considerations for the NTIA Broadband Technology Opportunities Program.

- The statute does not limit the availability of funding to computer labs or programs to encourage adoption and use of broadband technologies to areas that are unserved or underserved. These programs are vitally needed in urban America where the “take rate” for broadband services is lowest. Congress understood this fact and made the grants available free and clear of any level of service requirement.
- NTIA should establish as a priority increasing broadband adoption in population centers, with distinct tracking for connections for low-income and other historically low technology adopting residents, non-profits and disadvantaged businesses.
- Broadband that is unaffordable is unavailable. Therefore, the pricing of broadband services must be a vitally important consideration in not only judging grants, but in defining what is a un and underserved area.
- NTIA should define an "underserved area" to be an area lacking sufficient access to affordable high speed broadband services needed to facilitate economic development.
- NTIA should not surrender to the states the authority to prioritize BTOP grants and projects.
- NTIA should remain technologically neutral in its evaluation of grant applications and have as its goal promoting affordable access to the greatest number of Americans that the stimulus dollars may achieve, and
- NTIA must rigorously define the "public interest" test a private enterprise must pass in order to be eligible for stimulus funds. Limiting finds to only public-private partnerships as a means to meet the "public interest" test would not be too strong a standard.

The leadership of the City of Miami looks forward to working with NTIA, RUS and the FCC to jump start America’s connection to affordable broadband. We believe our *elevate* Miami initiative has been a model of success in providing affordable access and computing power to currently unserved urban citizens of Miami. These programs are essential to the future of our community.

Respectfully,  
Peter Korinis  
Chief Information Officer  
City of Miami  
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